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July 25, 2025

**Via CM/ECF**

Hon. Frederick J. Scullin, Jr., Senior U.S. District Judge  
U.S. District Court for the Northern District of New York  
James M. Hanley Federal Building & U.S. Courthouse  
100 S. Clinton St., P.O. Box 7255  
Syracuse, New York 13261

Hon. Daniel J. Stewart, U.S. Magistrate Judge  
U.S. District Court for the Northern District of New York  
James T. Foley U.S. Courthouse  
445 Broadway, 4th Floor  
Albany, New York 12207

Re: ***Prime Capital Ventures, LLC v Reign Financial International, Inc., et al.***  
Case No.: 1:23-cv-00207 (FJS/DJS)

Dear Judge Scullin and Magistrate Stewart:

This firm represents Plaintiff Prime Capital Ventures, LLC ("Plaintiff") in the above referenced action. Pursuant to the Court's July 11, 2025 text order, Plaintiff has no objection to bankruptcy counsel's request to conduct discovery ([Dkt. 65](#)).

Thank you for your time and attention to this matter.

Very truly yours,

**GIRVIN & FERLAZZO, P.C.**

By:

  
Daniel S. L. Rubin, Esq.

Cc: (via CM/ECF)  
Fred Stevens, Esq.  
Matthew A. Toporowski, Esq.